

**Davis Polk**

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December 6, 2021

Re: *Katzel v. American International Group, Inc.*, No. 20-CV-07220

**Via ECF**

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10017  
(212) 805-0125

Dear Judge Hellerstein:

We represent defendant American International Group, Inc. in *Katzel v. American International Group, Inc.*, No. 20-CV-07220, and we write on behalf of both parties pursuant to the Court's instruction at the December 3, 2021 conference. Below is the parties' agreed-upon schedule for remaining discovery, as modified by the Court at the December 3, 2021 conference, which the Court indicated will not be adjourned.

Event	Deadline
Deadline to Complete all Non-Party Document Productions	12/22/2021
Deadline to Complete All Outstanding Depositions, including Non-Party Depositions	1/10/2022
Disclose Affirmative Experts	1/24/2022
Disclose Rebuttal Experts	2/7/2022
Deadline to Complete Psychological Evaluation of Aaron Katzel	2/28/2022
Affirmative Expert Reports	3/15/2022
Rebuttal Expert Reports	4/15/2022
Deadline to Complete Expert Depositions	5/13/2022
Status Conference	5/20/2022, 10:00 a.m.

## **DavisPolk**

Respectfully Submitted,

/s/ Antonio J. Perez-Marques

Antonio J. Perez-Marques

cc: All Counsel of Record (via ECF)